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et al.*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

**Westinghouse Electric Company LLC,
et al.,**

Debtors.¹

Chapter 11

Case No. 1:17-bk-10751 (MEW)

(Jointly Administered)

**TOSHIBA CORPORATION AND STATUTORY UNSECURED CLAIMHOLDERS'
COMMITTEE'S JOINT CONSENT MOTION FOR CONFIDENTIALITY ORDER**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, if any, are: Westinghouse Electric Company LLC (0933), CE Nuclear Power International, Inc. (8833), Fauske and Associates LLC (8538), Field Services, LLC (2550), Nuclear Technology Solutions LLC (1921), PaR Nuclear Holding Co., Inc. (7944), PaR Nuclear, Inc. (6586), PCI Energy Services LLC (9100), Shaw Global Services, LLC (0436), Shaw Nuclear Services, Inc. (6250), Stone & Webster Asia Inc. (1348), Stone & Webster Construction Inc. (1673), Stone & Webster International Inc. (1586), Stone & Webster Services LLC (5448), Toshiba Nuclear Energy Holdings (UK) Limited (N/A), TSB Nuclear Energy Services Inc. (2348), WEC Carolina Energy Solutions, Inc. (8735), WEC Carolina Energy Solutions, LLC (2002), WEC Engineering Services Inc. (6759), WEC Equipment & Machining Solutions, LLC (3135), WEC Specialty LLC (N/A), WEC Welding and Machining, LLC (8771), WECTEC Contractors Inc. (4168), WECTEC Global Project Services Inc. (8572), WECTEC LLC (6222), WECTEC Staffing Services LLC (4135), Westinghouse Energy Systems LLC (0328), Westinghouse Industry Products International Company LLC (3909), Westinghouse International Technology LLC (N/A), and Westinghouse Technology Licensing Company LLC (5961). The Debtors' principal offices are located at 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Toshiba Corporation (“Toshiba”), respondent to discovery in the above-captioned Chapter 11 cases (the “Bankruptcy Cases”) pursuant to the Court’s order under Federal Rule of Bankruptcy Procedure 2004 (ECF No. 1106), and the statutory unsecured claimholders’ committee (the “UCC”; together with Toshiba, the “Movants”), by and through counsel, hereby jointly move the Court to enter a confidentiality order in the proposed form filed herewith.

As further explained in their proposed order, Movants believe that the guarantee of confidentiality is essential to Toshiba’s compliance with and successful completion of discovery in connection with the Bankruptcy Cases pursuant to the Court’s order under Rule 2004 (the “Rule 2004 Order”). Specifically, Movants intend to rely on the attached order’s provision that any confidential material exchanged in discovery shall only be used for the purposes of the Bankruptcy Cases, and Toshiba intends to rely on the order’s provision protecting such confidential material specifically from discovery by state or federal government entities. Movants therefore agree that the attached order is necessary to safeguard the discovery process between Toshiba and the UCC.

For the reasons explained here and in the attached proposed order, Movants respectfully request that the Court enter that order in these Bankruptcy Cases.

Respectfully submitted,

DATED: October 12, 2017

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Paul Leake

PAUL LEAKE

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The filer, Paul Leake, attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

DATED: October 12, 2017

By: /s/ Martin J. Bienenstock

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on October 12, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for all parties in this action.

/s/ Paul Leake _____

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